

COMPLAINT

(for filers who are prisoners without lawyers)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

2018 SEP 10 P 3:42

STEPHEN C. DRIES
CLERK

(Full name of plaintiff(s))

Daniel Karl Wortman

v.

Case Number:

18-C-1407

(Full name of defendant(s))

(to be supplied by Clerk of Court)

① Chief of Police (Racine Police Department)

② Adrienne Moore (State Public Defender)

③ Christopher Schmaling (Racine County Jail)

A. PARTIES

1. Plaintiff is a citizen of Wisconsin, and is located at
(State)

Red Granite Correctional Institution Red Granite, WI 54970
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant ^④ Current Chief of Police / Racine Police Department
(Name)

Defendants (ct)

⑥ Adriane Moore / State Public Defender

Wisconsin

State Public Defender 420 Sixth St. Racine, WI 53403

⑦ Christopher Schmaling / Racine County Sheriff (i.e. Racine County Jail)

Wisconsin

Racine County Jail 717 Wisconsin Ave. Racine, WI 53403

is (if a person or private corporation) a citizen of Wisconsin
(State, if known)

and (if a person) resides at _____
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Racine Police Department 730 Center St. Racine, WI 53403
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

The following defendants violated my rights: ① The Chief of Police on behalf of the Racine Police Department, ② Adrienne Moore on behalf of the Public Defender's Office, and Christopher Schmalzing on behalf of the Racine County Jail.

What they did, when, where, why, etc.

① The Racine Police Department led a team headed by Brad Spiegelhoff that violated my rights by implementing a no-knock search warrant that violated the civil rights of two disabled individuals. They failed to comprehend two disabled individuals were no threat to them and used unnecessary force. They arrested because of what I was charged with, I was a charger and failed to comprehend an internet crime is different than a crime against an actual child. This was done at my home at 1434 Cleveland Ave. Racine, WI and was done on November 9, 2015.

② The Public Defender's Office during my incarceration in the Racine County Jail from June 7, 2016 - September 17, 2017 had only one agenda and that agenda was for me to take a plea bargain. They were told of the abuse going on in that jail, but they ignored it and/or offered me no help and gave me no referrals. The Public Defender's Office failed to comprehend my case did not belong in a local court system. It belonged in an International Court of Justice in the Hague. The Public Defender's Office failed to comprehend that all seized video clips should have been ruled inadmissible and should have been thrown out.

③ While incarcerated in the Racine County Jail from June 7, 2016 - September 17, 2017, I underwent multiple forms of abuse that baffles comprehension. This abuse came from multiple sources - from other inmates, from the nurses and the doctors, from the chaplain, from the warden, from video visits, etc. Here is a sample of what they did: other inmates were allowed to verbally abuse inmates with no fear of punishment, other inmates were allowed to set off fire alarms several times and there were no deterrents to stop them, the doctors and the nurses let me go 35 days with no deodorant or soap or hair shampoo, the doctors and the nurses hid the fact an inmate attacked me and failed to send me to the hospital for X-rays, the doctors and the nurses ignored me peeing blood and would have let me die if not for the intervention of a family member, and those who declared me incompetent to stand trial have ignored my mental illness, and in prison that means no therapy or psychiatric care.

C. JURISDICTION

☐ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☒ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$4,000,000 —.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

Of the \$4,000,000, I want \$1 1/2 million from the Racine Police Department / \$1 1/2 million from the State Public Defender's Office, \$2 million from the Racine County Jail.

① From the Racine Police Department, I want termination of their employees, Paul Spiegelhoff. Proof they will first research all backgrounds of all persons issued a search warrant to and to take certain precautions if it is discovered the recipient (s) are disabled. In that case no force is needed!

② From the State Public Defender's Office, I want termination of Adeline Moore and all those of the attorneys who represented me. Proof the Public Defender's Office will not represent for their client to first present their evidence to the judge only and then enter plea after that.

③ From the Racine County Jail, I want termination of designated guards, of the entire medical staff, of the psychological staff, etc. I was placed in Medical Segregation. It was mismanaged and needs to be reorganized.

E. JURY DEMAND

I want a jury to hear my case.

☐ - YES

☒ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 31 day of August 2018.

Respectfully Submitted,

Daniel Wortman

Signature of Plaintiff

657663

Plaintiff's Prisoner ID Number

Red Granite Correctional Institution, PO Box 725,

Red Granite, WI 54970

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FULL FILING FEE



I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Full Filing Fee form and have attached it to the complaint.



I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.